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April 23, 2014

Mr. Walter Mugdan, Director
Emergency and Remedial Response Division
US Environmental Protection Agency, Region II
290 Broadway, 19th floor
New York, NY 10007

RE Request for Extension of Comment Period on EPA's FFS and Proposed Plan for
the Lower Passaic River

Dear Mr. Mugdan,


The Cooperating Parties Group (CPG) is profoundly disappointed that EPA recently issued the Proposed Plan for the lower 8 miles of the Lower Passaic River, especially since the CPG has been working so hard to complete the RI/FS for the entire 17 miles of the Lower Passaic River Study Area.

The National Contingency Plan (NCP) requires that EPA provide a reasonable opportunity for oral and written comments on the Proposed Plan. EPA's 60-day public comment period is manifestly inadequate for a thorough analysis of a document that references numerous highly technical reports, appendices and data that is nearly 8,000 pages in length.

EPA has further delayed the CPG's analysis of the FFS because, despite repeated requests from the CPG, EPA declined to share any significant level of technical detail contained in the report with non-governmental stakeholders, including the CPG.

The CPG requests that EPA extend the public comment period on the Proposed Plan by 120 days, for a total of 180 days. Even then, more time may be required as further analysis is conducted of the FFS. As a result, the CPG reserves the right to request an additional extension of the public comment period, should more time be needed to prepare detailed technical comments.

Very truly yours,



William H. Hyatt, Jr.

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cc: Mr. James Woolford, Director, OSRTI
Mr. Stephen J. Ells, OSRTI
Eric Schaaf, Regional Counsel
Sarah P. Flanagan, Assistant Regional Counsel
Mr. Raymond Basso, Strategic Integration Manager
Ms. Alice Yeh, Remedial Project Manager